

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In re* Flint Water Cases

No. 5:16-cv-10444-JEL-MKM

Hon. Judith Levy

Mag. Mona K. Majzoub

**DECLARATION OF RAYMOND HALL**

I, Raymond Hall, declare as follows:

1. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. My full name is Raymond Hall. My address is 229 Crosby St., Flint, Michigan, 48503. My telephone number is (810) 240-4631.

3. My date of birth is [REDACTED]. My attorney told me that when this declaration is filed, my date of birth will be redacted, because it is personal information and filing it violates the rules of this court. I put it in my declaration only because the Settlement says that all objectors must.

4. From April 25, 2014 until today, I have lived in Flint, Michigan, and in this time period I've sometimes been the person responsible for paying the water bill.

5. From April 2014 until about October 2015, I was exposed to Flint water because I drank it all of the time until I found out about the lead issue.

6. I am not one of the defendants to the litigation. I am not a judicial officer assigned to any Flint water case, nor am I staff or immediate family of a judicial officer or their staff in these cases. I am not one of the individual plaintiffs, nor am I listed in any exhibits to the Settlement.

7. I am not opting-out of the settlement—I am objecting.

8. With the help of my attorney, Frank Bednarz, I completed a registration form for the settlement.

9. I also registered as the “Next Friend” for my two daughters who are now age 8 and 10 and reside with me. My daughters have lived in Flint their whole lives and also drank the water, so they can be claimants to the Settlement.

10. I object to the fee request in this case. The fee award is too high and more of the money should go to class members like myself and claimants like my daughter.

11. I bring this objection in good faith. I have no intention of settling this objection for any sort of side payment. Unlike many objectors who attempt or threaten to disrupt a settlement unless plaintiffs’ attorneys buy them off with a share of attorneys’ fees, it is my understanding and belief that my attorneys at the Hamilton Lincoln Law Institute’s Center for Class Action Fairness (CCAF) do not settle objections for private kickbacks and will not withdraw an objection or appeal in exchange for payment.

12. Thus, if contrary to CCAF’s practice and recommendation, I agree to withdraw my objection or any subsequent appeal for a payment by plaintiffs’ attorneys or the defendant(s) paid to me or any person or entity related to me in any way without court approval, I hereby irrevocably waive any and all defenses to a motion seeking disgorgement of any and all funds paid in exchange for dismissing my objection or appeal. My goal is to reduce attorneys’ fees for all class members, not just profit myself.

13. My objection will be filed as a memorandum along with this declaration. The specific legal grounds of my objection are identified in the memorandum.

14. I have been given a copy of the legal memorandum and I signed it as required by the Settlement. I rely on my attorneys to make the legal arguments. I’m not an attorney myself, so I do not know how to judge whether it is a legally sufficient argument.

15. No one has put me up to this objection. No one has offered me anything for it. I know that filing this objection will not get me or my daughters additional money from the settlement. But I hope that the objection helps persuade the court to reduce attorneys' fees, which will benefit all claimants.

Executed on 3-28-2021 in Flint, Michigan.

  
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Raymond Hall